

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

April 30, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James R. Cho, U.S.M.J.
225 Cadman Plaza East
Courtroom 11D South
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, *et al.*
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Judge Cho:

This office, along with Milman Labuda Law Group PLLC, represents the Plaintiff IME WatchDog, Inc. (“Plaintiff”) in the above-referenced case. Plaintiff writes to respectfully provide an update to this Court regarding Defendants’ continued violations of its Orders.

We previously wrote to this Court to inform it that Defendants Safa Abdulrahman Gelardi (“Safa”) and Vito Gelardi (“Vito”) (Safa and Vito collectively hereinafter the “Defendants” or the “Gelardis”) sold their property located at 9 Woods End, Lake Harmony, PA 18624 on February 27, 2025, which transaction was recorded on March 20, 2025. See ECF Docket Entries [472](#) and [472-1](#). This was a violation of the Court’s Order directing the Gelardis to “notify the Court within three (3) days of entering into any contract to sell their ownership interest in any other property [aside from 148 Clay Pit Road, Staten Island, NY], including the identity(ies) of the buyers and an anticipated closing date.” See Text Only Order dated March 8, 2024.

Before commencing this litigation, Defendants owned the following properties: • 1523 N Hollywood Street, Philadelphia PA 19121 • 9 Woods End, Lake Harmony PA 18624 • 148 Claypit Road, Staten Island NY 10309 • 1475 Moon Valley Drive, Champions gate, FL 33896 Defendants bought 5265 Milford Road, East Stroudsburg, PA, one month after this litigation commenced, paying a \$107,000 down payment.

As discussed in the April 28, 2025 letter, Defendants’ only remaining property is 5265 Milford Road, East Stroudsburg, PA and their safe haven home in Cypress, Texas. It has come to Plaintiff’s attention that their final investment property has now been sold, as well. See https://www.zillow.com/homedetails/5265-Milford-Rd-East-Stroudsburg-PA-18302/9815637_zpid/ (“**Under Contract** - Back Up Offers Only. HISTORIC Airbnb, Hastings House, Circa 1763!”) (last accessed April 30, 2025) (emphasis added). It is worthy to note that virtually all of these properties were bought *after* the Gelardis misappropriated Plaintiff’s trade secrets and started their business which unlawfully competed with Plaintiff.

Accordingly, the Gelardis have repeatedly disregarded this Court's Orders, are in contempt, and now have substantial liquid assets which Plaintiff expects them to pay as part of a settlement and to satisfy the outstanding attorneys' fees due.

Plaintiff thanks this Court for its time and attention to this case, and looks forward to conducting the virtual settlement conference later today.

Dated: Lake Success, New York
April 30, 2025

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York
April 30, 2025

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

cc: all Counsel of Record (via ECF).